

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



May 24, 2011

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Reception hosted by United Space Alliance, Lockheed Martin, and the Boeing Company on May 25, 2011

NASA invitees, accompanied by their spouse or a guest, may attend a reception sponsored by United Space Alliance, Lockheed Martin, and the Boeing Company in the atrium at the Kennedy Center in Washington, D.C. on May 25, 2011, from 8:00 PM – 10:00 PM. This event will follow an official NASA event *Human Spaceflight: The Kennedy Legacy* for which any NASA employee may accept tickets to attend free of charge, and will provide NASA employees an opportunity to discuss the mission and other NASA programs with representatives of the communities participating in the reception.

Approximately 500 people are expected to attend this reception. Expected attendees include representatives of government, the legislative branch, the aerospace industry, and other business associates of the hosts, including family representatives of President John F. Kennedy. The reception will include refreshments valued at approximately \$75 per person. In accordance with 5 C.F.R. § 2635.204(g), and 14 C.F.R. § 1207.103, I find that the event meets the definition of a “widely attended gathering.” I further find that there is an agency interest in having NASA employees attend the event, as they will have the opportunity to further agency programs and operations through the exchange of views and information with other attendees.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect United Space Alliance, Lockheed Martin and the Boeing Company, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

Moreover, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend the reception if they reception they reimburse the sponsors the cost of the refreshments consumed for themselves and accompanying guests.


Adam F. Greenstone